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10 UNITED STATES BANKRUPTCY COURT
11
12 EASTERN DISTRICT OF CALIFORNIA

13 IN RE: CASE NO.2010-31551-A-7
14 DOCKET CONTROL NO: KE-01
15 HEARING DATE:JUNE 7,2010
16 HEARING TIME:9:00 A.M.
17 LARRY P. KRAWESKY COURTROOM:28
18 MARY E. MOORE-MINISTER THE HONORABLE MICHAEL S. MCMANUS

19
20 **MOTION FOR ORDER COMPELLING ABANDONMENT OF THE**
21 **ESTATE'S INTEREST IN DEBTORS' BUSINESS**

22 KAREN EHLER, on behalf of LARRY P. KRAWESKY and MARY E.
23 MOORE-MINISTER, the Debtors herein, hereby moves this Court for
24 an Order Compelling Abandonment of the Estate's Interest in the
25 Debtor's business. This Motion is based on the following facts:

- 26 1. This case was commenced with the filing of a Petition on
27 April 30, 2010. SUSAN SMITH was duly appointed to serve as
28 Trustee.
2. As shown on the Statement of Financial Affairs in this
case, the Debtor MARY E. MOORE-MINISTER operates a
consulting business known as "M. E. Moore-Minister, The

1 Consultant". The Debtor is a marketing and communications
2 consultant. Her work involves writing releases, writing
3 speeches, producing film and photography, planning meetings
4 and events, strategic planning and government relations.
5 Most of her business clients are involved with golf. She
6 attends and participates in events where she plays golf.
7 She operates this business out of her home. The business
8 has almost no assets and those assets are fully disclosed
9 and exempted in Schedules B and C. Schedule B filed in this
10 case identifies the following as assets of the business:
11

- 12 a. Payment received by the Debtor in the amount of
- 13 \$2513 from Rolling Hills Casino.
- 14 b. Payment owed by Northern CA Golf
- 15 Representatives Association but not yet
- 16 received in the amount of \$1000.
- 17 c. A business license
- 18 d. Fake plants, 25 frames, 50 vases, seasonal and
- 19 holiday décor used for the business.
- 20 e. 1 set of men's custom golf clubs with bag and 1
- 21 set of women's custom golf clubs with bag used
- 22 in the business.

23 3. Schedule C exempts these assets.

24 4. There are no other business assets which could be
25 liquidated by the Trustee.

26 5. Schedule I shows that income from this business is the
27 debtors' only current source of income.

28 6. The Schedules and Statement of Financial Affairs are
incorporated herein by reference.

1 7. 11 USC Section 554 provides for the abandonment of estate
2 assets which are burdensome or of inconsequential value to
3 the estate. Debtor's business is such a property.
4

5 8. Debtors assert that, based on the lack of any nonexempt
6 equity in any business related asset, there is no benefit
7 to the estate of either operating or shutting down this
8 business.
9


10 9. Federal Rule of Bankruptcy Proceeding 6007(b) permits a
11 party in interest, including the debtors, to file a motion
12 seeking to compel the Trustee to abandon property of the
13 estate.
14

15 Wherefore, the debtors move this Court to

16 1. Issue an Order Compelling the Trustee to Abandon the
17 Estate's Interest in the Debtors' Business.

18 2. For such other relief as the Court deems just and proper.
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20 Dated: May 11, 2010

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22 KAREN EHLER
23 Attorney for Debtors
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